

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-10091-MEL
)
 RICHARD A. RAMEY

ASSENTED-TO MOTION TO TEMPORARILY
MODIFY CONDITIONS OF PRETRIAL RELEASE

Defendant, Richard A. Ramey, moves this Court temporarily modify his conditions of release to allow him to travel to Cleveland, Ohio on Saturday, July 24, 2004 through Monday, July 26, 2004. As grounds for this motion, the defendant through counsel states the following:

1. The complaint in this matter was issued on February 25, 2004. Defendant was allowed to surrender to the Worcester Courthouse on March 5, 2004 and was arrested when he voluntarily surrendered. Defendant was conditionally released the same day and has remained on release since that time. As one of the conditions, defendant's travel was restricted to Massachusetts and the District of Florida, where his mother and other family members reside. Defendant was to notify Pretrial Services in advance of his travel to Florida.
2. Defendant seeks to take a family vacation for the upcoming weekend of July 24-26, 2004 to visit cousins and other extended family in Cleveland, Ohio. Defendant will travel by air and will be accompanied by his two children.
3. Pretrial Services has no opposition to defendant's travel to Cleveland, Ohio, but will require judicial authorization to allow him to do so.
4. Defendant has abided by all of his conditions of release while on release. Defendant previously traveled out of the District of Massachusetts to visit his mother and extended family and returned without incident.

5. The government assents to this motion.

RICHARD A. RAMEY,
By His Attorney:

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